



FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

DA 03-2731
September 24, 2003

Mr. Steven G. Coston
Sony Ericsson Mobile Communications (USA) Inc.
7001 Development Drive
RTP, North Carolina 27709

Dear Mr. Coston:

This letter responds to your letter on behalf of Sony Ericsson Inc. (Ericsson) dated August 13, 2003,¹ requesting confirmation of Ericsson's understanding of the Wireless Telecommunications Bureau's (Bureau's) *Ericsson Order*.²

On December 17, 1999, Ericsson filed a letter with the Bureau requesting approval of its 911 call completion method for its multi-mode products.³ The Bureau approved Ericsson's method subject to the same two conditions imposed by the Bureau for Nokia's method.⁴ The Bureau found that Ericsson's method, as originally proposed, differed in several aspects from all of the three methods approved by the Commission, including the Automatic A/B Roaming-Intelligent Retry (A/B-IR) method.⁵ The Bureau also found that once modified to comply with the same conditions that apply to Nokia's method, the Ericsson method should similarly satisfy the Commission's call completion principles.⁶

First, the *Ericsson Order* approved, as a feature in Ericsson's method, customer feedback regarding the status of the call until the call is completed.⁷ Accordingly, the handset must provide effective feedback to inform the user when 911 call processing is underway and has not finished.

Second, Ericsson's method must include a time limit for access attempts similar to the time requirement for the A/B-IR method and the method employed by Nokia.⁸ Under the *Ericsson Order*, the 17-second time limit is applicable to access attempts.⁹

¹ See Letter from Steven G. Coston, Technology Manager, Regulatory Services for Ericsson, Inc., to John Muleta, Chief, Wireless Telecommunications Bureau, Federal Communications Commission (August 13, 2003) (Request).

² 911 Call Processing Modes, WTB Docket No. 99-328, *Order*, 15 FCC Rcd 15671 (2000) (*Ericsson Order*).

³ Letter from David C. Jatlow, Counsel to Ericsson, Inc., to Thomas Sugrue, Chief, Wireless Telecommunications Bureau, Dec. 17, 1999 (Ericsson December 17 Request).

⁴ *Ericsson Order*, 15 FCC Rcd at 15673-74.

⁵ *Id.*

⁶ *Id.*

⁷ *Id.*

⁸ In response to WCA's comments that Ericsson's proposal did not specify the duration of the call attempt with the preferred carrier, Ericsson clarified that its multi-mode handsets will comply with the time limits for access attempts approved by the Commission for the A/B-IR method, specifically the 17-second limit, whether the handset is operating in the digital or the analog mode. Letter from David C. Jatlow, Counsel to Ericsson, Inc., to Magalie Roman Salas, Secretary, Federal Communications Commission, WT Docket No. 99-328, at 5-6 (Feb. 2, 2000) (Ericsson February 2 *ex parte* Letter).

⁹ See *Ericsson Order*, 15 FCC Rcd at 15674.

Similar to Nokia's method, the Bureau approved Ericsson's method with the understanding that access attempts are deemed unsuccessful if the handset has not received a voice or traffic channel assignment within a maximum of 17 seconds and that the access attempts must not exceed 17 seconds, regardless of whether the handset is operating in the digital or analog mode, before the handset attempts to call on another network.¹⁰

Subject to the two conditions described above, Ericsson's 911 call processing method as described in its December 17, 1999 request and as clarified by the February 2 *ex parte* Letter is an approved 911 call processing method.¹¹ Accordingly, we confirm that Ericsson's call processing method as approved satisfies the Commission's 911 call processing rules.¹²

I hope that this confirmation will assist you.

Sincerely,

John B. Muleta

Chief,
Wireless Telecommunications Bureau

¹⁰ See *Ericsson Order*, 15 FCC Rcd at 15674; see also Letter from John B. Muleta, Chief, Wireless Telecommunications Bureau, to Robert Pettit, Counsel to Nokia, May 30, 2003 (Nokia Letter).

¹¹ See generally *Ericsson Order*, 15 FCC Rcd 15671; Ericsson December 17 Request; Ericsson February 2 *ex parte* Letter.

¹² See *Ericsson Order*, 15 FCC Rcd 15671. See also 47 C.F.R. § 22.921.